

**IN THE UNITED STATES BANKRUPTCY COURT
EASTERN DISTRICT OF VIRGINIA
Alexandria Division**

In re:

BELLAMY BROWN

Debtor

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* **Case No. 13-11382**

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* **CHAPTER 13**

MOTION TO SUSPEND CHAPTER 13 PAYMENTS

COMES NOW Bellamy Brown, Debtor, through undersigned counsel, and hereby moves the Court to allow him to temporarily suspend his Chapter 13 payments. In support he would present the following:

1. On March 27, 2013, Debtor filed a voluntary petition for relief under Title 11, Chapter 13 of the Bankruptcy Code.

2. On July 11, 2013, this Court confirmed Debtor's plan of reorganization. Under the terms of the Plan, the Debtor is required to make payments of \$1,200.00 per month, for 36 months to the Trustee.

3. Shortly after confirmation, Debtor's position with his then employer, Capital Search Consultants, LLC, ended.

4. Afterwards, Debtor found new employment but that ended unexpectedly in early September when his employer terminated him after Debtor inquired about unpaid back wages.

5. Accordingly, Debtor would request a four (4) month suspension on his Chapter 13 payment to search for new employment

WHEREFORE, Debtor prays of this Court for an Order granting the following relief:

a) Allow Debtor to suspend his Chapter 13 Payments for a period of **four (4) months**;

b) Allow Debtor to resume payments beginning on January 27, 2014 and modify his Plan to increase the repayment period by four (4) months to compensate for the payments that were suspended during this period;

c) Such other and further relief that this Court deems necessary and proper.

Respectfully submitted this 31st day of October, 2013.

/s/ Jeremy C. Huang

Jeremy C. Huang, VSB 76861
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Falls Church, VA 22042
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CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on this 31st day of October, 2013, a copy of the foregoing Motion, Notice of Hearing and Proposed Order were served either by first class mail, postage prepaid or electronic delivery by the Court's electronic filing system (ECF) on the following parties:

Thomas Gorman
Chapter 13 Trustee
300 N. Washington St, Suite 400
Alexandria, VA 22314

Dell Financial Services, LLC
Resurgent Capital Services
PO Box 10390
Greenville, SC 29603-0390

USAA Federal Savings Bank
9441 LBJ Freeway, Suite 350
Dallas, TX 75243

Wells Fargo Card Services
1 Home Campus
3rd Floor
Des Moines, IA 50328

Bank of America, N.A.
Glasser and Glasser, P.L.C.
Crown Center, Suite 600
580 E Main St., Norfolk, Va 23510

County of Loudoun, VA
c/o Belkys Escobar
One Harrison St. SE, (MSC #06)
Leesburg, VA 20175-3102

Brookmeade Condominium Unit Owners Association
c/o Whiteford, Taylor, Preston
3190 Fairview Park Drive, #300
Falls Church, VA 22042

Washington Gas
Bankruptcy Dept
6801 Industrial Rd. Rm 320D
Springfield, VA 22151

American Express Bank FSB
c/o Becket and Lee LLP
POB 3001
Malvern PA 19355-0701

Sallie Mae Inc. o/b/o USAF
Attn: Bankruptcy Litigation Unit E3149
P.O. Box 9430
Wilkes-Barre, PA 18773-9430

Sallie Mae Trust
c/o Sallie Mae Inc.
220 Lasley Ave
Wilkes-Barre, PA 18706

Sallie Mae Inc. o/b/o Department of Education
P.O. Box 740351
Atlanta, GA. 30374-0351

/s/ Jeremy C. Huang